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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the matter of:)
MM Docket 99-25)
FCC 99-6)
Proposed Low-Power FM Service)

Trident Media and Broadcasting, Ltd., an Illinois corporation, respectfully submits the following as an addendum to its previously-filed comments in regard to the proposed Low-Power FM (LPFM) radio broadcast service.

Once again, Trident responds with disappointment and a degree of outrage to the manipulation of the proceedings of MM Docket 99-25 by the National Association of Broadcasters and others in the form of yet another extension of comment and reply comment periods in the current proceeding.

Trident has been led to believe that the LPFM service was proposed to allow diversity of programming, new ownership opportunities and radio service to underserved areas. The very reason why these criteria are not already in place is the Telecommunications Act of 1996, which was strongly supported and praised by the NAB from its infancy. We must question why an association which so strongly advocated this legislative oxymoron is allowed to so easily dictate these proceedings.

Reasonably, Trident offers an explanation to back the accusation aforementioned toward the Telecommunications Act.

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The Telecommunications Act of 1996 stated a purpose to allow for increased competition within the telecommunications industry, including broadcasting. In the very same piece of legislation, restrictions on ownership of broadcast stations were almost totally eliminated, opening the door for massive consolidation, particularly in the radio industry. This has resulted in a select few major companies, many of those not even operated by broadcasters, absorbing a large number of the nation's radio stations and leaving scores of communities without local radio service. Trident has seen this firsthand as the station licensed to its own city of West Frankfort, Illinois, is "operating" from another station's studio more than ten miles to the south of the city and is owned by a company headquartered nearly 350 miles away. West Frankfort is rarely even mentioned on the station outside of legal station identification each hour. This is not service in the public interest! Thousands of other communities are in the same trouble, and an association which carried the flag for the source of the trouble is being allowed to call the shots in proceedings that can solve the problem. Trident respectfully asks why.

What does the NAB plan to accomplish? What is their intent? Are they helping the cause of LPFM, or trying to save themselves? If they fought so hard to make radio what it is today, how can we believe that they are going to be cooperative with those of us who want to fill the void that

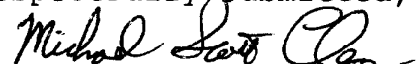
has been left?

Trident respectfully asks the Commission to consider the comments from the listening public instead of the comments from current broadcasters in determining whether or not a new radio service is needed. It is the public who knows whether or not a change is needed, it is the public who knows what they want and need in a radio station, and it is the public who will be served by local radio or largely unserved if LPFM or some form of local radio service is not initiated. The large number of comments from the public in favor of LPFM is all the evidence needed that there must be a return to local radio service.

As part of its desire to "put up a fair fight", Trident hereby resubmits its request for special authority to operate an experimental LP1000 radio broadcast station in its home city of West Frankfort, Illinois, to study any interference concerns and an LPFM station's ability to render effective service to a community. With no local radio service, West Frankfort is an ideal location for LPFM experimentation.

Trident respectfully requests the Commission's careful and thorough consideration of these points in conjunction with its previously filed comments on this proceeding.

Respectfully Submitted,



Michael Scott Clem
President

Trident Media and Broadcasting, Ltd.

5 June 1999

In reply refer to:

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